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ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MARGUERITE HIKEN and
THE MILITARY LAW TASK FORCE,

Plaintiffs,

v.

DEPARTMENT OF DEFENSE
and UNITED STATES
CENTRAL COMMAND,

Defendants.

Case No. CV-06-2812 (MHP)

**JOINT STIPULATION TO EXTEND
BRIEFING SCHEDULE AND CONTINUE
HEARING ON PLAINTIFFS' MOTION
FOR ATTORNEY FEES**

Judge: Hon. James Ware, Chief Judge

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1 This joint stipulation is entered into by and between all named parties in this action
2 including Plaintiffs Marguerite Hiken and the Military Law Task Force (“Plaintiffs”) and
3 Defendants United States Department of Defense and United States Central Command
4 (“Defendants”).

5 Pursuant to Civil Local Rule 6-2, the parties request the Court enter an order for
6 enlargement of time to file Plaintiff’s Reply to Defendants’ Opposition to Plaintiffs’
7 Renewed Motion for Attorney Fees by one Court day, until July 5, 2012.

8 The parties submit good cause supports this stipulation and request for order,
9 pursuant to the following:

10 A.) On May 24, 2012, the Court filed an Order Granting Defendants’ Motion for
11 Clarification and Partial Reconsideration, (Document No. 111), which set July 9, 2012 as
12 the presumptive hearing date on Plaintiffs’ Renewed Motion for Attorney Fees.

13 B.) On June 6, 2012 the Court filed an Order Denying Extension, (Document No. 114),
14 by which it set June 14, 2012 as the due date for Plaintiffs’ motion; June 28, 2012 as the
15 due date for Defendants’ Opposition; and July 3, 2012 as the due date for Plaintiff’s Reply.

16 C.) Although Defendants filed their Opposition on June 28, 2012 as Ordered, Plaintiffs
17 were unable to access the document via the PACER system on that date. In fact, Plaintiffs
18 were unable to access the Opposition until late the following day, June 29, 2012.

19 D.) Plaintiffs’ lead counsel, Colleen Flynn, is engaged in a trial in *David Venegas et al.*
20 *v. County of Los Angeles et al.*, Los Angeles Superior Court Case No. BC 207136, which
21 began on June 25, 2012.

22 E.) Plaintiffs have not previously sought an enlargement of time with regard to this
23 Reply.

24 F.) In light of the forgoing, the parties have agreed to extend the briefing schedule to
25 permit Plaintiffs to file their Reply on July 5, 2012.

26 WHEREFORE, the parties to this stipulation hereby agree and request entry of an
27 order as follows:
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1 1. The parties request the briefing schedule on Plaintiffs' Reply to Defendants'
2 Opposition to Plaintiffs' Renewed Motion for Attorney Fees be extended to permit
3 Plaintiffs to file their Reply on July 5, 2012.

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5 DATED: July 3, 2012

Respectfully submitted,

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7 BY: /s/ Colleen Flynn
8 COLLEEN FLYNN
9 CHRIS FORD
W. GORDON KAUPP
Attorneys for Plaintiffs

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12 DATED: July 3, 2012

Respectfully submitted,

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14 BY: /s/ Timothy A. Johnson
15 TIMOTHY A. JOHNSON
16 U.S. Department of Justice
17 Civil Division
18 Attorney for Defendants
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